

February 6, 2006

Marlene H. Dortch
Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB-06-TC-060 & EB Docket No. 06-36, Certification of CPNI Filing
(February 6, 2006)

As President of Call America, Inc., Inc. ("Call America"), a local exchange carrier certificated by the California Public Utilities Commission, I hereby certify, based on my personal knowledge, that Call America has established operating procedures, outlined in the accompanying statement, that comply fully with 47 C.F.R. 64.2009.

Please contact me at the above address and/or telephone number if you have any questions regarding this filing.

Sincerely,



Jeffrey Buckingham
President

**STATEMENT OF CALL AMERICA OPERATING PROCEDURES ENSURING
COMPLIANCE WITH
47 C.F.R. 64.2009**

1. Call America has a small customer base, composed entirely of business customers. As President of the company, I or other employees have a personal relationship with many of our customers. Thus, when we receive a call requesting customer proprietary network information ("CPNI"), it is our practice and policy to refer all such calls to me or the employee who has a personal relationship with the customer. Most of the time, I or other employees, know personally if the person placing the call is our customer's authorized representative.
2. Even if we recognize the caller as the customer's authorized representative, it is our practice and policy to refer the caller, first, to the customer's past bills for information regarding the customer's proprietary network information. We only discuss specific data points over the telephone when assisting an authorized customer representative in interpreting our bills, and only when the authorized customer representative has our past bills in front of him/her.
3. If we do not personally recognize a person calling Call America to request disclosure of customer proprietary network information, we require that person to send us a Letter of Authorization signed by the decision maker within the customer's company, usually an office of the company. We require that the letter specifically identify the people who are authorized to receive the requested information and provide to us identifying information that will allow us to identify positively that person when/if he/she calls. Even after receipt of such a Letter of Authorization and a call from the identified individual, it is our practice not to give out such information pursuant to a telephone call from that person. It is our practice, rather, (1) to call the signer of the Letter of Authorization to confirm his/her authorization of the disclosure of his/her CPNI to the identified individual and then (2) to call that person back at the number assigned to our customer, as an additional step to ensure that the person requesting the information is, indeed, the customer's authorized representative.
4. Finally, after taking the steps outlined in #3, above, we usually refer the requester of CPNI to refer to the customer's bill, as described in #2, above, because most of the customer's CPNI is on the customer's bill.

Given the small size of our customer base and our resulting personal knowledge of our customers and their authorized representatives, the above procedures are more than adequate to ensure that Call America does not reveal CPNI to any but a customer's authorized representative. We do not disclose or provide CPNI to third parties in connection with marketing campaigns. Should our policy change in this regard, we will do so only in compliance with 47 C.F.R. 64.2009(c).